

HI/MI/EN + CB

110000399790
423913

Ticona

January 12, 2012
EIJ-009-12
TPI Project – 07082011-MISC

Bishop Facility
Highway 77 South
P.O. Box 428
Bishop, TX 78343

RECEIVE

JAN 17 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

Mr. David Eppler
Air Toxics and Inspection Coordination Branch
U.S.EPA Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

**Subject: Clean Air Act ("CAA") Section 114 Information Request –
Supplemental Response**

Dear Mr. Eppler,

As our follow up to our meeting on December 20, 2011, and email of January 12, 2012, Ticona Polymers, Inc. (Ticona) is submitting the following information relating to the EPA's Section 114 Information Request. The team continues to work diligently on this project and will provide the next update to you by February 6th.

MO3/MO4 Flares

A Ticona team consisting of process control, project, production, process safety and environmental engineers has been evaluating options to address the Btu value issues. The team is working on this project as highest priority. This team has been in contact with representatives of both John Zink and Callidus Technologies to leverage their expertise on this project.

Two options currently being assessed are: adding Methane to increase the heating value and using a molecular seal to prevent flashback if the center steam is discontinued. There are numerous production and safety considerations associated with each option.

The team reevaluated the flare design calculations and has sent them to Callidus engineering staff for further review. The team has scheduled a meeting this coming week with Callidus engineers to discuss the effects of adding additional Methane to the flares.

MS Flare

Attached is a snapshot of historical computer trends for enrichment gas that demonstrates the enrichment gas has consistently been present in a sufficient amount to maintain the Btu value at or above 200 Btu. The enrichment gas is comprised of 86% Methane (a trace amount of Methanol) and 14% Nitrogen. Based on this composition it has been determined the enrichment gas flow to the flare must be maintained above 3.9 scfh. Also attached is PI Historian Data in trend form that demonstrates the enrichment gas to the MS flare was well above 3.9 scfh. Note that we are providing data from PI Historian from the second Wednesday of each month between 2007 & 2010 as a representative sample. Because all PI Historian data must be retrieved in an Excel spreadsheet, we are also including a screen shot of the MS flare enrichment gas data for the week of 1/2/12 – 1/9/2012.

4HAP Flare

Ticona has many Critical Task Standard Operating Procedures (SOP's) that are used throughout the facility. A Critical Task SOP must be in the operator's possession at the time the task is being completed and requires an additional layer of approval for each step as it is completed. Attached for your background is Ticona's guidance document for procedures, which is titled "Celanese Ltd. Procedure Writers Guide." Highlighted on page 9&10 of 13 is the definition of a Critical Task SOP.

A Note has been added to three Critical Task SOP's regarding maintaining the minimum net heating value for the flare during transfers of Hydrofluoric Acid. The previous version of the Critical Task SOP and the modified version are included for your review. It has been determined that, when the unloading pressure exceeds 40 psi in one hour, the flare will have <300 Btu. The modified SOP's include a Note at the relevant step making the operators aware of what the pressure setting should be. The modifications to the SOP's can be found (highlighted in Yellow) on:

SOP PR- 4HAP-315-02 "Prepare V-2816 Operation New" on pages 3&4 of 11;
SOP 4HAP- Load-005-007 "HF Truck To V-2816 New" on page 3 of 7;
SOP IBU-ACY-007-05 "Transfer HF From 4HAP to V-8403 New" on pages 3&9 of 10

Please note that the modified versions do not currently have signatures. They will not be signed until the SOP management review process has been completed.

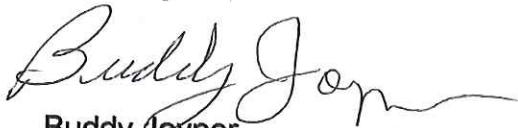
GUR Unit

The steam to vent gas ratio has been addressed in the GUR unit by implementing a Critical Task SOP and adding a steam to gas ratio alarm to the DCS system. The alarm is set at 0.5 to 2 thus giving the operators an indication that steam must be reduced. A note was added in CT SOP 2.10 Rev 6 (Shutdown and De Inventory the Polymerization Area) on page 2 of 15. This note has been inserted at a critical step which could cause a steam to vent gas ratio imbalance. A note was also added in CT SOP 6.9 Rev 5 (T-50801, "Flare Tower" Startup) page 27 of 29 as this is the critical step which might cause a steam to vent gas ratio imbalance. The Note has been highlighted for your convenience, and we have also attached the old SOPs for your reference.

Please note that some of the information being provided has been marked as Confidential, and we request that you treat this information as confidential.

Should you have any questions or need additional information, please contact me at (361) 584-6104.

Sincerely



Buddy Joyner
Sr. Environmental Specialist II